

# Exhibit F

Declaration of Jared M. Moser, Esq.

**DECLARATION OF JARED M. MOSER, ESQ.. IN SUPPORT OF RICHLAND HOLDINGS, INC. DBA ACCTCORP OF SOUTHERN NEVADA'S RENEWED MOTION FOR ATTORNEYS' FEES**

Jared M. Moser, Esq. declares, pursuant to 28 U.S.C. § 1746 and NRS § 53.045, under penalty of perjury, that the foregoing is true and correct:

1. I am over the age of 18 years and have personal knowledge of the facts stated herein, except for those stated upon information and belief, and as to those, I believe them to be true. I am competent to testify as to the facts stated herein in a court of law and will so testify if called upon.

2. I am an attorney with the law firm of Marquis Aurbach Coffing ("MAC"), counsel for Defendant Richland Holdings, Inc. d/b/a AcctCorp of Southern Nevada ("Richland") in the matter of *Ahmed et al. v. Richland Holdings, Inc. et al.*, Case No. 2:19-cv-01925-JCM-DJA, before this Court.

**QUALITIES OF THE ADVOCATES**

3. MAC is AV rated by Martindale-Hubbell and is listed in Martindale-Hubbell's registry of Preeminent Lawyers.

4. Mr. Clement is a Shareholder with MAC, and he earned his Juris Doctor from Southwestern Law School.

5. Prior to joining MAC, he was a law clerk to the Honorable Justice Nancy M. Saitta of the Nevada Supreme Court.

6. He is admitted to practice law in both California and Nevada, and his practice primarily includes general civil and commercial litigation.

7. I am an Associate Attorney with MAC and was responsible for some of the legal services provided in this matter.

8. I began practicing law in Hawai'i in 2011 before I returned to Las Vegas in 2012, where I began serving as law clerk to the Honorable Nancy L. Allf in the Eighth Judicial District Court of Nevada.

9. During my clerkship, I was also admitted to practice law in Nevada courts, in 2013.

1           10. After my clerkship with Judge Allf, I went on to clerk for the Honorable Johnnie  
2 B. Rawlinson of the U.S. Court of Appeals for the Ninth Circuit and am now licensed to practice  
3 in the Federal District Court for the District of Nevada as well as in the Ninth Circuit Court of  
4 Appeals and U.S. Supreme Court.

5           11. My practice primarily includes general civil and commercial litigation and  
6 appellate practice, and I have authored in, and contributed to, local and national legal  
7 publications.

8           12. Mr. Clement and I have defended or are defending a number of cases involving  
9 allegations of Fair Debt Collection Practices Act violations against Richland or our other clients.

10           13. My hourly rates and those of Mr. Clement are, in fact, far below the average for  
11 comparably experienced attorneys in firms of comparable size and experience, providing further  
12 proof of the reasonableness of the amounts charged.

13           14. True, accurate, and authentic copies of MAC's billing invoices, redacted to  
14 preserve attorney-client privilege and work product content, and to exclude work performed  
15 relative to these Plaintiffs' related state court proceedings against Richland, are attached to  
16 Richland's Motion as **Exhibit E**.

17           15. To be clear, the time and corresponding fees incurred that are being sought in the  
18 instant Motion are only those relating to MAC's work on the federal litigation, to the extent I  
19 was able to review 25 pages of invoicing for the duration of this litigation, and identify to the  
20 best of my ability which time entries correspond to which proceedings, state or federal.

21           16. As demonstrated by those invoices, MAC spent approximately 168.40 total hours  
22 litigating this case on behalf of Richland – 95.5 hours of my time and 72.9 hours of Mr.  
23 Clement's time – for a total of \$49,014.00 in attorney fees – that is, \$25,497.50 for my time at  
24 \$245/hour, increasing to \$275/hour at the beginning of 2020, and \$23,516.50 for Mr. Clement's  
25 time at \$305/hour, increasing to \$325/hour at the beginning of 2020.

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10001 Park Run Drive

/s/ Jared M. Moser  
Jared M. Moser, Esq.